

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking on the)	
Commission's Own Motion into the Service)	
Quality Standards for All Telecommunications)	R. 02-12-004
Carriers and Revisions to General Order 133-B)	
_____)	

**REPLY COMMENTS OF SPRINT NEXTEL REGARDING
ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO**

Introduction

Sprint Communications Company, L.P. (U 5112 C), Sprint Telephony PCS, L.P. (U 3064 C), Sprint Spectrum L.P. as agent for Wireless Co., L.P. (U 3062 C) *dba* Sprint PCS, and Nextel of California, Inc. (U 3066 C) ("Nextel") (collectively, "Sprint Nextel") respectfully submit these Reply Comments regarding the March 30, 2007 Assigned Commissioner's Ruling and Scoping Memo in the above-captioned proceeding.

These Reply Comments respond to the May 14, 2007 "Comments of the Division of Ratepayer Advocates [(“DRA”)] re Inclusion of Wireless Coverage Maps as Part of the Commission's Rulemaking 02-12-004" ("DRA Comments") and "Opening Comments of The Utility Reform Network [(“TURN”)] on Scoping Memo Issues" ("TURN Comments").

DRA's principal argument is that the Commission should require wireless carriers to provide "meaningful maps of wireless service coverage."¹ In contrast, TURN contends that the Commission should adopt service quality "indicators" for wireless carriers.² These proposals appear to ignore two important developments in the wireless marketplace since 2002, when the Commission opened this proceeding. These developments are: (i) the availability of detailed

¹ See DRA Comments at 15.

² See TURN Comments at 14

wireless service coverage information on the Internet and (ii) the opportunity for wireless customers to terminate service within 30 days of signing a service contract, without incurring an early termination fee, if they are not satisfied with the service they have received. In conjunction with the fierce competitive forces that characterize the wireless marketplace today, these developments make it unnecessary and unwise for the Commission to adopt DRA's and TURN's proposals.

Discussion

I. THE COMMISSION SHOULD REJECT DRA'S PROPOSAL THAT WIRELESS CARRIERS BE REQUIRED TO PROVIDE PROPRIETARY "ENGINEERING MAPS" IN ORDER FOR CUSTOMERS TO EVALUATE WIRELESS SERVICE COVERAGE.

Reduced to its essence, DRA's principal argument is that wireless carrier engineers develop and use, internally, highly detailed radio signal propagation maps for network design purposes.³ According to DRA, however, wireless carriers fail to provide their customers with maps showing signal strength and coverage data in "sufficient detail to allow consumers to make meaningful purchase decisions based on coverage."⁴ To solve this alleged problem, DRA proposes that wireless carriers, both on the Internet and in their stores, should be required to provide their customers with detailed coverage maps showing signal strength and coverage data in "the same *granularity* and accuracy as used by their engineers."⁵

³ See DRA Comments at 3-4. To the extent that DRA asks the Commission to require wireless carriers to provide consumers with "detailed signal contour" maps, DRA's Comments apparently seek the same relief as the Consumer Protection and Safety Division ("CPSD") sought four years ago in this proceeding. See CPSD's Opening Comments, filed April 1, 2003, at 10-11. Nextel explained in its May 5, 2003 Reply Comments in this proceeding why CPSD's recommendations should be rejected. See *id.* at 6-25. See also, "Declaration of Leonard Cascioli, Vice President, RF Engineering, Nextel Communications," filed May 5, 2003 ("Cascioli Declaration"). Sprint Nextel incorporates by reference herein Nextel's May 5, 2003 Reply Comments and the accompanying Cascioli Declaration.

⁴ See DRA Comments at 2.

⁵ *Id.* at 3 (emphasis in original). As Nextel explained in its May, 2003 Reply Comments, the terms "coverage" and "coverage maps" can be highly misleading. See *id.* at 6, n. 20. DRA would have the Commission believe that "coverage" and "coverage maps" indicate a wireless subscriber's ability to receive or make a call at a given geographic location at any given time. On the contrary, wireless carriers' signal contour maps only indicate the

The premise on which DRA's argument fails is its argument that “. . .no [wireless] carrier or reseller makes available signal strength and coverage data of sufficient detail to allow consumers to make meaningful purchase decisions based on the quality of the wireless provider's signal strength.”⁶ As shown below, DRA's claim is plainly incorrect with regard to Sprint Nextel.⁷ Sprint Nextel provides a wealth of information for consumers interested in assessing the expected signal strength or “coverage” of Sprint's and Nextel's networks at particular locations of interest.⁸ To do so in a manner that is both practical and manageable (while also flexible enough to meet different consumers' interests), Sprint Nextel harnesses the power of the Internet and sophisticated electronic mapping tools to internal RF signal strength information. The result is that consumers can check “coverage” at the “street level” at virtually any location in the United States. The mapping tool is easy to use, yet still incredibly powerful.

DRA's claims supposedly are backed up by “research” in the marketplace by DRA attorneys and other personnel, who purported to try to find “granular” “street level” information through a survey of wireless carrier Internet sites and retail outlets in the Bay Area (San Francisco, Oakland and Palo Alto). It does not appear, however, that DRA or its researchers tried very hard to locate the relevant, and readily accessible, information.

For example, as the Commission can readily see simply by following (“clicking on”) the Web links (“universal resource locators” or “URLs”) set forth below, Sprint Nextel provides

predicted, not the actual, signal strength in any location and provide no guarantee that a wireless customer will be able to complete a call from areas that may be depicted on such maps as having, on a *predicted* basis, strong RF signals. *Id.* See also Cascioli Declaration at 2-3.

⁶ *Id.* at 8.

⁷ In these Reply Comments Sprint Nextel speaks only for itself and not for other wireless carriers (which presumably will provide the Commission, on their own behalf, with information regarding the coverage information they provide to their customers).

⁸ No wireless carrier can guarantee that “there will always be coverage” or that a wireless call will “always go through” at a particular location. “Coverage” information is essentially a prediction of what a caller can usually expect regarding the likelihood that RF signal strength will be sufficient for a call to be connected to the network.

highly detailed, “street level” coverage information for both the Sprint and Nextel wireless networks. The level of expected coverage is illustrated in the color attachments to these comments. Both the Sprint and Nextel expected coverage maps show gradations of coverage from “Best” to “Good” to “Fair” to none. As will be seen, it is unclear how DRA could have been unaware of the detailed information that Sprint Nextel makes available on the Web regarding expected coverage provided by the two networks.⁹

To see the extent to which consumers may obtain detailed expected coverage information for the Sprint and Nextel networks:

1. Go to the Sprint Nextel home page: <http://www.sprint.com/index.html>.
2. Click on the “Coverage” tab, select the network of interest (Sprint or Nextel or PowerSource¹⁰ – these comments will first use the Sprint network) and enter a Zip Code of interest (say, “94301,” the Zip Code for the office of the undersigned). Then click on the “Check Coverage” button.
3. What first appears (with the “zoom” tool on the upper left at approximately half-way between “zoom out” at the top (note symbol of entire United States) and “zoom in” at the bottom (note symbol of single house) of the “slider bar”) is a map of the entire San Francisco Bay Area showing “Best” coverage (dark green), “good” coverage (somewhat lighter green), “fair” coverage (an even lighter green) and no coverage

⁹ The Sprint and Nextel networks are separate and distinct. Sprint’s network uses code division multiplexing or Code Division Multiple Access (“CDMA”) technology, whereas Nextel’s “IDEN” network uses “time division multiplexing” or Time Division Multiple Access (“TDMA”) technology. Each network has its own radios, antennas, and other appurtenances and equipment. (Some Sprint Nextel handsets provide access to both networks. *See* n. 10, *infra*.) As will be shown in these Reply Comments, the expected coverage information that Sprint Nextel provides for these two different networks allows a consumer to see, at an extremely discrete level, where one network provides coverage and the other does not, thereby allowing a consumer to make a highly informed choice as to which service to use – if this is the criterion on which the consumer wishes to make a purchase decision. Many consumers, of course, make their decisions on the basis of other considerations, such as handset features (*e.g.*, the ability to take photographs or to download and play music).

¹⁰ Sprint Nextel’s “PowerSource” service provides a combination of Nextel Walkie-Talkie Service plus Sprint voice and data service.

(grey). There is also a small white arrow indicating the Zip Code's approximate location. This can be viewed at the following URL:

<http://coverage.sprintpcs.com/IMPACT.jsp?covType=sprint&returnUrl=http%3A%2F%2Fnextelonline.nextel.com%2FNASApp%2Fonlinestore%2Fen%2FAction%2FDisplayPhones&mapzip=94301&x=36&y=17>.¹¹

4. Using the “zoom tool” on the “slider bar,” one can “zoom in” to the most detailed level possible, by sliding the slide bar to the bottom of the zoom scale. The URL does not change. After the “loading” process is complete (approximately 5 seconds), the map now shows a portion of Palo Alto at the “street level” – all streets and blocks are clearly visible. This is approximately the geographic center of the 94301 Zip Code area. The scale is one inch to 200 yards. The map thus depicts an area of about 800 yards by 800 yards. The coverage indicated is all dark green or “Best.”
5. By clicking on the “arrow bar” on the left of the map, which says “WEST,” the portion of Palo Alto shown in the map can be shifted west from the geographic center of the Zip Code to a view of the downtown area of Palo Alto. Three “clicks” on this arrow bar puts the office address of the undersigned, 418 Florence Street (a street that is one block long and clearly depicted as such), just slightly above the center of the

¹¹ By clicking on the link to “Important Coverage Information” (at the bottom of the Web page), a consumer will also see that Sprint Nextel clearly advises its customers: “Our coverage maps provide high level estimates of our coverage areas when using your device outdoors under optimal conditions. Coverage isn't available everywhere. Estimating wireless coverage and signal strength is not an exact science. [¶] There are gaps in coverage within our estimated coverage areas that, along with other factors both within and beyond our control (network problems, software, signal strength, your wireless device, structures, buildings, weather, geography, topography, etc.), will result in dropped and blocked connections, slower data speeds, or otherwise impact the quality of services. [¶] Services that rely on location information, such as E911 and GPS navigation, depend on your device's ability to acquire satellite signals (typically not available indoors) and network coverage. E911 services also depend [on] local emergency service provider systems/support. Estimated future coverage subject to change. [¶] Need more help: Try browsing other topics, searching the index or contact us directly: Call 888-211-4727.” These caveats clearly advise consumers that the depicted coverage is an estimate of expected coverage and not a guarantee that coverage will always be available or that a call will always “go through.”

map. Again, the URL has not changed. This depiction of coverage at the street level is attached as Exhibit A.¹²

6. It is also possible to obtain coverage information at the specific street address level.

To do this, one must “click on” the “Map an Address” tab at the upper right hand side of the map. After filling in the desired address (these comments use the office address of the undersigned), one then must “click on” the “Map Coverage” button.

By doing so, one comes to the Web page at the following address:

<http://coverage.sprintpcs.com/IMPACT.jsp?covType=sprint&returnUrl=http%3A%2F%2Fnextelonline.nextel.com%2FNASApp%2Fonlinestore%2Fen%2FAction%2FDisplayPhones&mapzip=94301&x=36&y=17>. (This is the same URL as above.) By

again using the “zoom tool” on the “slider bar,” an even more detailed view of coverage can be obtained. There is a white arrow showing the exact location of the designated address.

7. From the same Web page, it is also possible to obtain information regarding the coverage offered by the Sprint Mobile Broadband Network. By “clicking on” the box and the URL for the “Sprint Mobile Broadband Network,” one comes to the following Web page:

<http://coverage.sprintpcs.com/IMPACT.jsp?covType=sprint&returnUrl=http%3A%2F%2Fnextelonline.nextel.com%2FNASApp%2Fonlinestore%2Fen%2FAction%2FDisplayPhones&mapzip=94301&x=80&y=15>. This map shows areas with “Broadband

download speeds” (light orange) and areas with “Increased upload and download speeds” (reddish orange) for Sprint Power Vision services and wireless connectivity

¹² The color exhibits to these Reply Comments have been printed, scanned and saved as .pdf/A-compliant documents. Viewing the map on the Internet provides a higher quality resolution than the scanned .pdf document.

at broadband-like speeds. One can again use the “slider bar” to “zoom in” on the map and see coverage information for this service on a street level basis.

8. It is also possible to repeat the steps above to determine coverage provided by the Nextel network. From the home page at: <http://www.sprint.com/index.html>, click the “Coverage” tab. Click the Nextel button, enter a Zip Code (in this case, enter “94102,” the Zip Code of the Commission) and then click on “Check Coverage,” which leads to the following URL:

<http://coverage.sprintpcs.com/IMPACT.jsp?covType=nextel&returnUrl=http%3A%2F%2Fnextelonline.nextel.com%2FNASApp%2Fonlinestore%2Fen%2FAction%2FDisplayPhones&mapzip=94102&x=66&y=10>. Coverage is shown as “Best” (dark orange), “Good” (lighter orange), “Fair” (still lighter orange) and “None” (white or empty space). Using the “slider bar,” one can “zoom in” to street level coverage information. The expected coverage at the location of the Commission’s San Francisco offices, in the State Building at Van Ness and McAllister, is shown as “Best” (dark orange). One can also click on the “Map an Address” tab, fill in the Commission’s San Francisco address at 505 Van Ness Avenue, and see the expected coverage at that location:

<http://coverage.sprintpcs.com/IMPACT.jsp?covType=nextel&returnUrl=http%3A%2F%2Fnextelonline.nextel.com%2FNASApp%2Fonlinestore%2Fen%2FAction%2FDisplayPhones&mapzip=94102&x=66&y=10>. One can then “zoom in” using the “slider bar” and see a white arrow indicating the Commission’s location on the map and the expected coverage there:

<http://coverage.sprintpcs.com/IMPACT.jsp?covType=nextel&returnUrl=http%3A%2F%2Fnextelonline.nextel.com%2FNASApp%2Fonlinestore%2Fen%2FAction%2FDi>

[splayPhones&mapzip=94102&x=66&y=10](#). A copy of this page is attached to these Reply Comments as Exhibit B.

9. To test whether the Nextel map provides different gradations of coverage in a single map “view,” the reader may examine, with the “slider bar” moved two bars above the most detailed “zoom” level), expected coverage at the intersection of Alpine Road and Highway 280 (slightly southwest of the campus of Stanford University, accessed through the 94305 Zip Code). The map of the area where this intersection is located shows different areas of expected “Best,” “Good,” “Fair” and “No” coverage – all in the same “view” of that area, as depicted in Exhibit C.
10. Now assume that a potential purchaser wants to compare the expected Sprint network coverage to the expected Nextel network coverage for the exact same location. It’s easy to shift to the Sprint network expected coverage map. One simply “clicks on” the “Sprint Coverage” tab. Immediately the map shows an expected level of coverage as “Best” for the same areas where the Nextel map did not indicate expected coverage. (*See Exhibit D.*) Thus, the “map tool” offers the consumer a remarkably agile and highly detailed view of expected levels of coverage. With all due respect to DRA’s researchers, Sprint Nextel does not believe that the expected coverage maps for the two networks could possibly be easier to use or that adding expected signal strength contours to the maps would make them any more useful or intelligible. In fact, the added detail would likely make them *less* useful to consumers.
11. The Web site also permits customers, in the same manner, to check on expected coverage for Sprint “PowerSource” service. The map shows “PowerSource” coverage, Sprint PCS voice and data service only, and Nextel Walkie-Talkie Service

only. The “slider bar” allows a customer to “zoom in” in the same manner as discussed above.

Sprint Nextel believes that consumers find the expected coverage information depicted on the Web pages discussed above to be helpful as they try to make informed decisions about the purchase of Sprint Nextel service. The expected coverage maps do not show expected signal strength contour lines. However, Sprint Nextel believes that customers would far prefer to see an easily understood graphic depiction of expected “Best,” “Good,” “Fair” and “No” coverage in maps with different colors. Second, signal strength (expressed in decibel levels) can mean different things for different wireless technologies and therefore would likely be meaningless to the average consumer.¹³ If it were adopted, which it should not be, DRA’s proposal would actually leave most consumers thoroughly confused. The Commission should not venture into designing coverage maps for consumers or Web sites for carriers.

For these additional reasons, the Commission should reject DRA’s proposal.

II. EVEN IF CONSUMERS HAD THE MOST HIGHLY DETAILED SIGNAL STRENGTH INFORMATION IMAGINABLE, IT STILL WOULD NOT PROVIDE ANY GUARANTEE THAT ANY PARTICULAR WIRELESS CALL WOULD BE CONNECTED OR REMAIN CONNECTED.

The other respect in which DRA’s Comments rest on a flawed premise is their assumption that, if consumers only knew signal strength measurements at particular locations of interest, they could always be fully assured that, at such locations, their wireless calls would “go through” (*i.e.*, be connected to the called party) without fail and not be “dropped” (*i.e.*, be disconnected) in the midst of the call. As Nextel explained in detail in this proceeding more than

¹³ As Nextel explained in 2003, “[G]iven that RF signal strengths can mean different things for different wireless carriers, depending on the technologies they use (*e.g.*, TDMA, CDMA, iDEN, GSM), it would be almost impossible for consumers who were not RF engineers to compare one carrier’s ‘coverage’ to another’s based on signal contour maps alone.” Nextel May 5, 2003 Reply Comments at 7, n.21.

four years ago,¹⁴ this assumption is completely mistaken and reflects a basic misunderstanding of the “art” of wireless telephony.

Even if wireless carrier customers had the most highly detailed RF signal strength information imaginable, they still would not have – nor could any wireless carrier provide – a guarantee that any particular wireless call would connect to the called party or remain connected during the course of the call at any given location. There are simply too many variables that could affect and interfere with the ability to make and complete a wireless call. The factors affecting coverage include, but are not limited to, weather- and terrain-related variables as well as the number of users seeking to use the network at the same time and location. Plainly, wireless carriers cannot control such variables. These variables were thoroughly explained in the Cascioli Declaration.¹⁵ If the Commission were to adopt DRA’s proposal, which it should not do, it would result in consumers having a mistaken understanding with regard to wireless coverage. The Commission should accordingly reject DRA’s proposal.

III. IN ADDITION TO DETAILED COVERAGE MAPS, CONSUMERS ALSO HAVE THE ABILITY TO ACTUALLY “TEST DRIVE” SPRINT NEXTEL’S SERVICES.

DRA’s argument also fails for another significant reason. In addition to detailed maps, consumers have the ability to test whether wireless carrier networks offer coverage sufficient to meet their particular expectations. Sprint Nextel customers can engage in a live, 30-day “test drive” of their wireless handset and service, during which they may, at any time, with no questions asked, elect to cancel their service contract and return their wireless handset without

¹⁴ See “Reply Comments of Nextel of California, Inc. in Response to Opening Comments on Order Instituting Rulemaking on Service Quality Standards and Revisions to General Order 133-B,” *filed* May 5, 2003, and “Declaration of Leonard Cascioli, Vice President, RF Engineering, Nextel Communications,” *filed* May 5, 2003. Sprint Nextel urges the Commission to keep in mind that wireless carriers are frequently aware of the desirability of adding additional radios and antennas to boost capacity or expected coverage in a given location, yet are blocked from doing so by local zoning restrictions, natural obstacles and terrain, man-made obstacles, environmental restrictions, and numerous other hindrances to effective antenna siting.

¹⁵ See *id.* at 4-7, ¶¶ 7-12.

incurring an early termination penalty.¹⁶ The opportunity for a “test drive” allows consumers to confirm, if they wish to do so, how closely the expected coverage information available on the Internet comports with the way they expect to use their wireless phone. Consumers usually have a good sense of where they expect to use their wireless phones, and the “test drive” lets them see how the service performs under various “real world” conditions.

The Commission can and should feel confident that most consumers would far prefer actually using a new phone in the areas of concern to them, at the times of concern to them, under conditions they are likely to experience, rather than poring over the type of RF signal contour maps that DRA seems to think would be helpful. The “test drive” opportunity is a direct result of the intense competition in the wireless marketplace today. The fierce competition between wireless carriers requires them to deliver the highest quality service, and the incentive of winning and retaining customers operates far more efficiently than any “command and control” mechanism that DRA might devise. Accordingly, the Commission should reject DRA’s proposal.

IV. THE COMMISSION SHOULD NOT ADOPT TURN’S PROPOSAL FOR SERVICE QUALITY MEASUREMENTS.

In a throwback to the era of monopoly telephone service, where the Commission closely regulated all aspects of service provided by a single carrier, ranging from the rates charged to the

¹⁶ The “Service Plans and Rates” brochure for Sprint and Nextel phones available on June 15, 2007, at the same Sprint store on University Avenue in Palo Alto visited by DRA researcher Helen Mickiewicz, Esq., clearly and visibly states, in pertinent part: “Our Guarantee: At Sprint, we back up our promise of delivering a combination of powerful network, value and capabilities with a trio of programs designed to ensure that you’re satisfied with your service plan, phone and our network. As a Sprint customer, you’ll enjoy our: [¶] Sprint 30-Day Risk-Free Guarantee – We’ll give you 30 days to try Sprint risk free. If you are not completely satisfied with Sprint, your service, phone or network, simply return your phone and deactivate service within 30 days. We’ll return your activation fee and waive the early termination fee, and you will only be responsible for charges based on your actual usage. [¶] To qualify, you must within 30 days of activation: (1) return your complete, undamaged phone with the original retailer’s proof of purchase to where you purchased the phone, and (2) request that we deactivate your service. In all instances, you are responsible for all charges based on actual usage (partial monthly service charges, taxes and Sprint fees). If you purchase your phone through a Sprint authorized dealer, additional dealer fees may apply.” Within the first six months after signing or extending a service contract, Sprint customers may also “. . . switch to a plan of equal term at no additional charge without signing a new contract.”

speed with which operators answered calls, TURN recommends that the Commission adopt seven different “indicators” for wireless service.¹⁷ The “indicators” and “goals” are not well defined¹⁸ and it is not clear what use the Commission could or would make of them under any circumstances. However, the Commission should need only a moment to recognize how inappropriate it would be to adopt any of TURN’s proposed “indicators” or “goals.”

What TURN proposes would saddle the Commission and wireless carriers alike with a complicated, contentious, time-consuming and expensive regime for collecting and reporting statistics that would not provide any reliable guide for whether a wireless carrier’s service would prove satisfactory to any particular consumer. Certainly TURN’s proposed “indicators” would not provide any guidance as to whether a particular call would “go through” or “be dropped” or not. Given the nature of RF signals and the complexity of the “art” of wireless telephony, the “high level” statistics would have no relevance to the “street level” facts. Over time, the statistics would simply gather dust on Commission shelves as each month’s network improvements and the introduction of new technologies and services made them increasingly irrelevant. Even if the statistics proposed by TURN could be collected and were then made available, they would not assist consumers anywhere near as much as the actual, live, 30-day, hands-on, real-world “test drive” of a wireless carrier’s service – an opportunity that wireless carriers such as Sprint Nextel already provide their prospective customers. In this manner the battle for marketplace success is fought among the carriers, large and small, one consumer at a

¹⁷ See TURN Comments at 14, Table 2.

¹⁸ For example, TURN proposes that the Commission adopt an “indicator” called the “Call Success Rate” for which TURN proposes a “goal” of “Over 95%.” What this means is completely unclear. If a consumer tried to place a call from an area where a carrier had no coverage, obviously the call would not “go through.” Presumably, for TURN, this would not be a “successful” call. This would not, however, be the carrier’s fault. If a consumer tried to place a call at a time and location where so many other users were also trying to place calls (*e.g.*, in a huge traffic jam or at a baseball stadium following a record-setting home run) that call volumes exceeded the network’s capacity, the call would not “go through.” Again, this would not be the carrier’s fault. See n. 17, *supra*. The so-called “Call Success Rate” or “goal” would not be a reliable or reasonable “indicator” of anything useful to the consumer. None of TURN’s proposed “indicators” could withstand close scrutiny, and each would lead to time-consuming and expensive regulatory proceedings to determine their meaning and potential application.

time – a situation in which wireless consumers can only benefit. There is no need for the Commission to intervene the workings of an effective and vigorous competitive marketplace.

Conclusion

For the reasons stated above, the Commission should not adopt the “coverage map” requirements or service quality “indicators” and “goals” proposed by DRA and TURN.

Respectfully submitted:

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Dated: June 15, 2007

Certificate of Service

I, Earl Nicholas Selby, hereby certify that, on June 15, 2007, I caused a copy of the foregoing document, entitled:

REPLY COMMENTS OF SPRINT NEXTEL REGARDING ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO

to be served by electronic mail on the parties to this proceeding with electronic mail addresses on the service list maintained on the Commission's Web site for this proceeding, as indicated on the following pages. I further caused a copy of the foregoing document to be served by U.S. Mail, first class postage prepaid, on parties without email addresses and the Assigned Commissioner and Assigned ALJ, in envelopes addressed as follows:

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I certify that the above statements are true and correct.

Dated: June 15, 2007, at Palo Alto, CA.

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EXHIBIT A

EXHIBIT B

EXHIBIT C

EXHIBIT D